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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA

v.

ADRIAN GOOLCHARRAN,  
a/k/a "ADRIAN AHODA,"  
a/k/a "ADRIAN AJODA," and  
NICOLO DENICHILO

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Hon. Tonianne J. Bongiovanni

Mag. No. 20-5006

COMPLAINT

I, Frank Adamo, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Senior Special Agent with the United States Department of Justice Office of Inspector General, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

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Frank Adamo, Senior Special Agent  
U.S. Department of Justice  
Office of Inspector General  
(Senior Special Agent Frank Adamo  
attested to this Affidavit by telephone  
pursuant to F.R.C.P. Section 4.1(b)(2)(A)  
on the 13th day of March, 2020.)

Sworn to before me and subscribed in my presence,  
March 13th, 2020 at Trenton, New Jersey

HON. TONIANNE J. BONGIOVANNI  
UNITED STATES MAGISTRATE JUDGE

  
Signature of Judicial Officer

ATTACHMENT A

**COUNT 1**  
**(Conspiracy)**

From in or about June 2018 to in or about March 12, 2020, in the District of New Jersey and elsewhere, defendant

ADRIAN GOOLCHARRAN,  
a/k/a "ADRIAN AHODA,"  
a/k/a "ADRIAN AJODA," and  
NICOLO DENICHILO,

and others, did knowingly and intentionally combine, conspire, confederate and agree to:

- (a) defraud the United States Bureau of Prisons ("BOP") by impeding, impairing, and disturbing the BOP's lawful and legitimate function to maintain the order, discipline, and security of federal prisons, including Federal Correctional Institution Fort Dix ("Fort Dix"); and
- (b) commit an offense against the United States, specifically provide prohibited objects to inmates of Fort Dix, including marijuana, testosterone cypionate (an anabolic steroid), tobacco, cell phones, and cell phone chargers, and an inmate of a prison possessing and obtaining and attempting to possess and obtain such prohibited objects, contrary to Title 18, United States Code, Sections 1791(a) and (d)(1)(B),(F)&(G);

and did acts as set forth in the complaint to effect the objects of the conspiracy.

In violation of Title 18, United States Code, Section 371.

**COUNT 2**  
**(Providing Contraband to a Federal Inmate)**

On or about March 12, 2020, in the District of New Jersey and elsewhere, defendants

ADRIAN GOOLCHARRAN,  
a/k/a "ADRIAN AHODA,"  
a/k/a "ADRIAN AJODA," and  
NICOLO DENICHILO,

did knowingly and intentionally provide and attempt to provide prohibited objects to an inmate of Fort Dix, including cell phones, in violation of Title 18, United States Code, Sections 1791(a) and (d)(1)(F)-(G);

ATTACHMENT B

I, Frank Adamo, a Senior Special Agent with the U.S. Department of Justice Office of Inspector General, have been personally involved in the investigation of this matter. The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of business and telephone records and other evidence. Because this complaint is being submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

**BACKGROUND**

1. At all times relevant to this Complaint, Federal Correctional Institution Fort Dix ("Fort Dix") was a low-security federal prison located in Burlington County, New Jersey.

2. Defendant ADRIAN GOOLCHARRAN, a/k/a "ADRIAN AHODA," a/k/a "ADRIAN AJODA," ("defendant GOOLCHARRAN") was a resident of Union City, New Jersey.

3. Defendant GOOLCHARRAN used several telephone numbers, including numbers ending in -4023 ("Goolcharran Phone 1"), -2138 ("Goolcharran Phone 2"), -6578 ("Goolcharran Phone 3"), and -0497 ("Goolcharran Phone 4").

4. Defendant NICOLO DENICHILO ("defendant DENICHILO") was a resident of Jersey City, New Jersey.

5. Co-Conspirator 1 ("CC-1") was a resident at Fort Dix from on or about June 21, 2017 to on or about September 20, 2018. Following his release from Fort Dix, CC-1 resided at a halfway house in Newark, until in or about December 2018, and then moved to a residence in Jersey City (the "CC-1 RESIDENCE").

6. CC-1 used several telephone numbers, including a number ending in -5962 ("CC-1 Phone 1") and a number ending in -7517 ("CC-1 Phone 2").

7. As set forth below, there is probable cause to believe that defendant GOOLCHARRAN and defendant DENICHILO conspired with others (including CC-1) to use unmanned aircrafts, or drones, to smuggle contraband into Fort Dix (the "Drone Conspiracy").

### **EVIDENCE OF THE DRONE CONSPIRACY**

8. On or about July 26, 2018, at approximately 1:45 a.m., an officer at Fort Dix observed a drone hovering above the roof of one of the housing units in the prison. Officers responded to the roof and recovered a black plastic bag which contained contraband, including the following: 35 syringes, 15 cell phones, 10 cell phone batteries, 30 cell phone chargers, 15 twenty-count sleeves of what appeared to be Clenbuterol pills, 14 vials of sterile water, 2 vials labeled 250 mg Testosterone Enanthate, 2 vials labeled 250mg Testosterone Cypionate,<sup>1</sup> 4 vials labeled 100mg Trenbolone Acetate, and a box of Just For Men hair color. At approximately 2:20 a.m., an officer on patrol behind the food service warehouse observed a black garbage bag, ripped open, near approximately 11 cell phones laying on the ground. The black garbage bag contained approximately 105 packages of tobacco, 2 packages of matches, and approximately 12 cell phones. Approximately one hour after the initial drone-sighting, officers observed fishing line hanging down from the rooftop of another housing unit in the prison. When officers responded to the rooftop, they found and secured a drone (the "July 2018 Drone") with fishing line attached. Officers observed that one of the vent covers near the roof hatch was loose and missing its bolts, possibly providing inmate access to the rooftop. The July 2018 Drone was identified as a DJI Matrice 600 Pro.

9. Since the July 2018 drone drop, there have been multiple drone drops and suspected drone drops at Fort Dix. For example:

- a. On or about April 16, 2019, at approximately 6:50 am, officers at Fort Dix recovered a black trash bag with string attached, similar to string used in the July 2018 and previous drone drops. The package contained approximately 84 packets of Hydroxycut drink mix, 9 vacuum sealed bags of tobacco, 3 Samsung phone batteries, 2 pairs of reading glasses, and 1 white L8 Star cell phone.
- b. On or about September 26, 2019, at approximately 10:25 am, Fort Dix officers responding to report of a possible drone discovered a package with green wire attaching it to a drone that was stuck in a tree. The package contained approximately 33 black J3 Luna Pro cell phones, 1 black Samsung cell phone, 2 white Samsung cell phone chargers, 2 white metal SawZall blades, 1 contact lens case, 1 bottle of contact lens solution, 2 pairs of contact lenses, and 40 SIM Cards.

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<sup>1</sup> Laboratory testing later confirmed that this contained Testosterone Cypionate, a controlled substance listed in Schedule III.

- c. On or about October 1, 2019, at approximately 11:10 pm, a Fort Dix officer observed a package hitting the ground near the fence line at Fort Dix. The package was attached to a fishing line that lead the officers into the woods, where a drone was stuck in a tree. The package contained approximately 32 black Samsung Galaxy J7 phones, 32 SIM cards, 2 Samsung chargers, 1 Husky hand tool with 2 tool bits, 2 pairs of contact lenses, 1 contact lens case, and 1 bottle of contact lens solution.
- d. On or about November 20, 2019, officers recovered an abandoned drone in the vicinity of Fort Dix and, in the vicinity, also recovered a black bag containing approximately 19 Samsung Galaxy phones, 7 L8Star mini cell phones, 21 phone chargers, 30 SIM cards, 3 vacuum sealed bags of loose tobacco, and 1 bag of a leafy green substance that later tested positive as marijuana.

10. The investigation has established probable cause to believe that defendant GOOLCHARRAN and defendant DENICHILO were flying the drones and contraband into Fort Dix. Forensic analysis of electrical tape found on the July 2018 Drone revealed a match through the Combined DNA Index System ("CODIS") to defendant GOOLCHARRAN's DNA sample. In addition, a fingerprint obtained from a plastic bag used in a recovered drone drop matched defendant DENICHILO's fingerprint.

11. On or about April 16, 2019, the same day as a suspected drone drop at Fort Dix, defendant DENICHILO was with GOOLCHARRAN in the Fort Dix area. At approximately 7:56 p.m., officers with the Pemberton Borough Police Department conducted a motor vehicle stop less than five miles from Fort Dix. The driver was identified as defendant GOOLCHARRAN, and the passenger was identified as defendant DENICHILO.

12. Phone records obtained pursuant to a grand jury subpoena, also show extensive communication between defendant DENICHILO and multiple numbers belonging to defendant GOOLCHARRAN. From in or about April 2018 to in or about December 2019, there were over 2,000 communications between the two. Several of these communications occurred either the day before or the day of confirmed or suspected drone drops, including the July 26, 2018, November 11, 2018, and April 16, 2019 drone drops, while others coincided with dates on which Fort Dix officials reported additional drone sightings at Fort Dix, including August 15, 2018 and January 22, 2019.

13. Defendant GOOLCHARRAN used Goolcharran Phone 2 to coordinate drone drops with others, including CC-1. On or about June 27, 2019, law enforcement agents searched the CC-1 RESIDENCE pursuant to

search warrants agents recovered a cell phone from CC-1's pocket.<sup>2</sup> CC-1's phone contained contacts with Goolcharran Phone 2, in which they appear to have coordinated drone drops at Fort Dix. For example, on or about April 15, 2019, defendant GOOLCHARRAN and CC-1 had the following exchange:

<b>From</b>	<b>To</b>	<b>Approximate Time</b>	<b>Message</b>
Defendant GOOLCHARRAN	CC-1	3:17 AM	Yooo
CC-1	Defendant GOOLCHARRAN	5:47 AM	Was gud
Defendant GOOLCHARRAN	CC-1	1:04 PM	Yoo
CC-1	Defendant GOOLCHARRAN	1:21 PM	Was gud bro
Defendant GOOLCHARRAN	CC-1	1:23 PM	Same shyt
Defendant GOOLCHARRAN	CC-1	1:24 PM	Hit me when you can

14. CC-1 then called defendant GOOLCHARRAN at or about 1:24 p.m. The next morning, at approximately 6:50 a.m., the package of contraband described above was found in Fort Dix with a cord attached to it.

15. On or about April 22, 2019, CC-1 sent a message to Goolcharran: "U got the pics send them to me." In response, Goolcharran sent CC-1 a photo that appeared to be an aerial shot of Fort Dix. Approximately 2 minutes later, CC-1 responded with the same photo, marked with two yellow lines, and a message, "Behind the buildind [sic] where the yellow is the long yellow line is a fence." Approximately one minute later, defendant GOOLCHARRAN sent CC-1 another aerial photo that appeared to be Fort Dix, which contained orange target marks over several housing units. Approximately eight minutes later, CC-1 responded with the same photo, marked with a black dot behind a particular housing unit, and a message stating, "Black dot." Based on this exchange, it is likely that defendant GOOLCHARRAN and CC-1 were discussing where to fly the drone and drop contraband packages.

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<sup>2</sup> During the search, agents also found other evidence of CC-1's involvement in the drone drops, including a box from Amazon with approximately 14 empty cell phone boxes, a bag containing approximately 20 cell phone charging cords in their original packaging, a bag containing approximately 11 LG cell phones and 7 empty packages of SIM cards, and a bugler tobacco box consistent with tobacco recovered from Fort Dix following suspected drone drops on October 30, 2018 and November 11, 2018.

16. On or about April 26, 2019, CC-1 sent a message to defendant GOOLCHARRAN asking, "U think that u cud do something 2m." Defendant GOOLCHARRAN responded, "2m too windy 20mph." Based on these communications, there is probable cause to believe that CC-1 was trying to arrange a drone drop with defendant GOOLCHARRAN for the next day.

17. According to records obtained pursuant to grand jury subpoena from the Retailer, there were two repair jobs submitted by a customer using the Goolcharran Phone 2. On or about March 15, 2019, a Matrice 600 drone was submitted for repair by a customer who provided the Goolcharran Phone 2 as a contact. According to the repair notes, "Crashed arm cracked power distribution broken. Wont turn on." On or about June 10, 2019, the same drone was returned for further repair by "Hash Patel" using the Goolcharran Phone 2.

18. "Hash Patel" submitted two additional repair jobs to the Retailer, using Goolcharran Phone 3. On or about July 12, 2019, another Matrice 600 drone (bearing a different serial number than the drone that "Hash Patel" previously sent in for repair) was submitted because the controller was not linking to the drone. Also on or about July 17, 2019, "Hash Patel" dropped off another Matrice 600 drone for repair for problems with the drone's GPS and flight capability.

19. A search of a contraband cell phone that Fort Dix officials confiscated from an inmate at Fort Dix showed that the Goolcharran Phone 3 sent a text message on or about November 13, 2019, a week before a downed drone was recovered, stating "Dji m600 payload drop." DJI m600 is likely a reference to the brand and model of the drone that defendant GOOLCHARRAN and defendant DENICHILO used or intended to use in a drone drop.

20. GPS data obtained from drones recovered during the investigation showed an area located in the woods outside of Fort Dix where previous drones had been launched (the "Launch Site"). On or about March 7, 2020, at approximately 10:55 p.m., a trail camera located near the Launch Site recorded two individuals, one of whom resembled defendant GOOLCHARRAN. The man resembling defendant GOOLCHARRAN appeared to be using a remote control while looking up towards the sky. After disappearing from view, the individuals reappear on the recording at or about 11:08 p.m. The man resembling defendant GOOLCHARRAN carried a drone, and the other person carried what appeared to be a stand or drone part. Location data for Goolcharran Phone 4 collected pursuant to a search warrant showed that Goolcharran Phone 4 was in the area of Fort Dix on March 7, 2020 at approximately 11:02 p.m., around the time that the trail camera showed the man resembling defendant GOOLCHARRAN carrying a drone.

21. On or about March 9, 2020, law enforcement agents went to the Launch Site and recovered multiple pieces of black and silver plastic, consistent with the tips of the blades on a drone propeller.

22. On or about March 9, 2020, law enforcement was also advised that “Hash Patel” came to the Retailer’s store that same day, where he dropped off a drone for service and purchased drone propellers. According to the Retailer’s records, the same customer account was used to purchase a drone camera on or about September 27, 2019, which was paid for by a credit card with the same last four digits as a credit card linked to one of defendant GOOLCHARRAN’s financial accounts. Surveillance video from March 9, 2020 obtained from the Retailer shows defendant GOOLCHARRAN entering the store holding a drone. The surveillance shows defendant GOOLCHARRAN bring the drone to the counter and point out what appears to be damage on the drone to store employees. Photos of the drone taken after defendant GOOLCHARRAN dropped it off show broken propeller blades with the tips missing, and what appear to be dirt and grass stains on the broken drone.

23. On or about March 12, 2020, officials at Fort Dix learned through sources that a drone drop was expected that evening. Beginning at approximately 7:02 p.m., the location information for Goolcharran Phone 4 showed that it was in the area of the Launch Site. At approximately 7:45 p.m., Fort Dix officials observed a drone above a housing unit. An inmate in the area was found in possession of a package wrapped in a black plastic bag with fishing line attached. The package contained approximately 34 cell phones, 9 chargers, 51 SIM cards, multiple earbuds, and 3 SD cards.

24. Law enforcement agents approached the Launch Site at approximately 8:00 p.m. They came upon two individuals, both of whom fled on foot while agents pursued them. Agents observed one of the men, later identified as defendant DENICHILO, hiding in a ditch near the Launch Site. He was wearing rubber gloves, boots, a hooded sweatshirt, and a heavy, waterproof coat. The color of his clothing was dark, suggesting an effort on defendant DENICHILO’s part to conceal himself in his surroundings while launching and flying the drone. Additionally, in a search incident to arrest, agents obtained from his pocket seven crisp \$100 bills, likely all or a portion of payment for his role in the drone launch.

25. A silver Acura SUV (the “SUV”) was parked in the area of the Launch Site. Through the window, agents observed a drone in the backseat of the car. The SUV was registered to an individual with the same last name as defendant GOOLCHARRAN. Agents seized the SUV.